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March 5, 2015

VIA ECF AND E-MAIL (Failla_NYSDChambers@nysd.uscourts.gov)

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

*Re: Forni v. Resnick, et al., United States District Court,
Southern District of New York, Case No. 1:14-cv-09458-KPF:
Response to Plaintiff's Letter-Motion for Extension
of Time to File Opposition to Dispositive Motions*

Dear Judge Failla:

Defendant Shutterstock, Inc. ("Shutterstock") hereby responds to Plaintiff's counsel's request (ECF # 137), made pursuant to Individual Rule 2.E,¹ to extend to March 27, 2015 Plaintiff's current March 9, 2015 deadline to file her oppositions to the dispositive motions filed pursuant to this Court's January 7, 2015 Order (ECF # 118).

We express and extend our sincere concern to Mr. Annotico and his family, and our heartfelt wishes for his family member's swift and complete recovery, and of course do not oppose and sympathetically consent to the requested extension.

For multiple reasons unrelated to this case, however, the resulting calendar adjustment would be difficult and burdensome to Shutterstock's counsel, as a result of which Shutterstock

¹ The letter request (ECF # 137) cites Individual Rule 3.E, but it is Individual Rule 2.E that provides for requests for extensions of time.

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hereby requests that, if Plaintiff's counsel's request is granted, Shutterstock receive through April 17, 2015 – rather than through April 10, 2015 – to file its reply.

Sincerely,

MILLER GOLER FAEGES LAPINE LLP

/s/ Steven J. Miller

STEVEN J. MILLER (Ohio Bar No. 0014293)
(Admitted *pro hac vice*)

cc: Counsel (by email and ECF System notification)